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Attorneys for Defendants
DENNIS J. HERRERA and CITY AND COUNTY
OF SAN FRANCISCO, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COMMITTEE ON JOBS CANDIDATE
ADVOCACY FUND and BUILDING
OWNERS AND MANAGERS
ASSOCIATION OF SAN FRANCISCO
INDEPENDENT EXPENDITURE
POLITICAL ACTION COMMITTEE,
political action committees organized
under the laws of California and of the
City and County of San Francisco,

Plaintiffs,

vs.

DENNIS J. HERRERA, in his official
capacity as City Attorney of the City and
County of San Francisco, KAMALA D.
HARRIS, in her official capacity as
District Attorney of the City and County
of San Francisco, the SAN FRANCISCO
ETHICS COMMISSION of the City and
County of San Francisco, and CITY AND
COUNTY OF SAN FRANCISCO,

Defendants.

Case No. C 07 3199 JSW

**DECLARATION OF ANN M.
O'LEARY IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: September 17, 2007
Time: 1:30 p.m.
Place: Courtroom 2

Trial Date:

1 I, Ann M. O'Leary, declare as follows:

2 1. I am a Deputy City Attorney in the Office of City Attorney Dennis Herrera. I am
3 one of the counsel of record for City Attorney Dennis J. Herrera and have personal knowledge of
4 the matters set forth herein, unless otherwise stated, and could competently testify thereto.

5 2. Attached as Exhibit A to this declaration is a true and correct copy of the
6 following news article: Lance Williams and Chuck Finnie, Brown Nets 'Soft Money' Windfall,
7 S.F. Examiner, Sept. 7, 1999.

8 3. Attached as Exhibit B to this declaration is a true and correct copy of the
9 following news article: John Wildermuth, Soft Money Gives Brown Deeper Pockets, S.F.
10 Chron., Oct. 12, 1999, at A22.

11 4. Attached as Exhibit C to this declaration is a true and correct copy of the
12 following news article: Bob Porterfield, Better to give than to receive . . ., S.F. Bay Guardian,
13 Nov. 24, 1999.

14 5. Attached as Exhibit D to this declaration is a true and correct copy of the
15 following news article: Phillip Matier and Andrew Ross, 'Soft Money' Contributors Will Do
16 What Brown Won't, S.F. Chron., Dec. 1, 1999.

17 6. Attached as Exhibit E to this declaration is a true and correct copy of the
18 following news article: Erin McCormick, Independent Campaign Efforts Benefit Brown, S.F.
19 Examiner, Dec. 9, 1999.

20 7. Attached as Exhibit F to this declaration is a true and correct copy of the
21 following news article: Michael Warren, San Francisco's Mayor's Race Awash in Soft Money,
22 S.F. Chron., Dec. 10, 1999.

23 8. Attached as Exhibit G to this declaration is a true and correct copy of the
24 following news article: Lance Williams and Chuck Finnie, Money, Workers Gave Brown
25 Victory, S.F. Examiner, Dec. 15, 1999.

26 9. Attached as Exhibit H to this declaration is a true and correct copy of the
27 following news article: Erin McCormick and Scott Winoker, Soft Money Gave Brown A Boost,
28 S.F. Examiner, Dec. 16, 1999.

1 10. Attached as Exhibit I to this declaration is a true and correct copy of the following
2 news article: Erin McCormick and Scott Winoker, Tab For Mayor's Landslide: \$5 Million, S.F.
3 Examiner, Dec. 16, 1999.

4 11. Attached as Exhibit J to this declaration is a true and correct copy of the following
5 news article: Stephanie Salter, A Hard Look at Brown's Soft Money, S.F. Examiner, Dec. 16,
6 1999.

7 12. Attached as Exhibit K to this declaration is a true and correct copy of the
8 following news article: Phillip Matier and Andrew Ross, Breadth of Brown's Win Beat
9 Campaign Team's Expectation, S.F. Chron., Dec. 17, 1999.

10 13. Attached as Exhibit L to this declaration is a true and correct copy of the
11 following news article: Bob Porterfield and A. Clay Thompson, Zoning for Sale?, S.F. Bay
12 Guardian, January 5, 2000. Planning commission minutes demonstrating the date of the hearing
13 on the Environmental Impact Report for the Bryant Square Project can be found at:
14 <http://sfgov.org/site/uploadedfiles/planning/mn200001.htm#0106>. Minutes demonstrating that
15 this project was approved by the Planning Commission can be found at:
16 http://sfgov.org/site/planning_page.asp?id=19807

17 14. Attached as Exhibit M to this declaration is a true and correct copy of the
18 following news article: Savannah Blackwell and Bob Porterfield, The Best Mayor Money Can
19 Buy, S.F. Bay Guardian, February 16, 2000.

20 15. Attached as Exhibit N to this declaration is a true and correct copy of the
21 following news article: Lance Williams and Chuck Finnie, Gusher of 'Soft Money' a Bonanza
22 for San Francisco Mayor, May 2, 2001.

23 16. Attached as Exhibit O to this declaration is a true and correct copy of the
24 following news article: Lance Williams, Chuck Finnie, and Jenny Strasburg, 'Juice Politics' at
25 City Hall, July 29, 2001.

26 17. I declare under penalty of perjury, under the laws of the State of California, that
27 the foregoing is true and correct and that if called as a witness I could competently testify
28 thereto.

1 Executed this 27th day of August, 2007 at San Francisco, California.
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4 /s/
ANN M. O'LEARY
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